

responding to the plurality of operations by the plurality of hardware devices.

29. (Amended) The method of claim 1, wherein the plurality of objects comprise redundant array of independent disk objects.

**Remarks:**

**A. *Rejection of Claims Over Savitzky or Savitzky and Muller in View of Christiansen***

The Office Action has rejected pending claim 1 under § 102(e) over U.S. Patent No. 5,732,261 (Savitzky). Applicants respectfully traverse this rejection. As amended, claim 1 incorporates the limitation of dependent claim 28 and recites that the hardware devices "comprise a redundant array of independent disks." Because Savitzky does not disclose such a redundant array of independent disks (RAID) as conceded by the Office Action (p. 32), the rejection is overcome.

The Office Action has rejected pending claims 29-32 under 35 U.S.C. § 103(a) as being unpatentable over Savitzky in view of U.S. Patent No. 6,247,077 (Muller) and in further view of U.S. Patent No. 5,915,253 (Christiansen). As discussed above, Savitzky does not teach or suggest a redundant array of independent disks. Further, nowhere does Muller teach or suggest a "plurality of objects [which] comprise redundant array of independent disk objects." Thus there is no teaching or suggestion to combine Savitzky with Muller to obtain the method of claim 29. For at least this reason, claim 29 and claims 30-32 depending therefrom are patentable over the proposed combination.

For the same reasons, the proposed combination of Savitzky and Muller and Christiansen does not teach or suggest RAID objects comprising "at least one disk object, at least one array object and at least one volume object", as recited by claim 30. As discussed above, Savitzky and Muller do not teach or suggest

RAID objects, and certainly do not teach or suggest such RAID objects comprising at least one disk, array and volume object. Further, Christiansen does not teach or suggest any multiple disk arrangement and certainly not a redundant array of independent disks. Christiansen also does not teach or suggest array objects whatsoever, or at least one volume object of "a redundant array of independent disk objects." Thus claim 30 is patentable over the proposed combination for this further reason.

***B. Rejection of Claims Under Brumley and Muller or Brumley and Morris***

The Office Action has rejected pending claims 6-10 under 35 U.S.C. § 103(a) over U.S. Patent No. 5,926,775 (Brumley) in view of U.S. Patent No. 5,926,775 (Muller). Applicants respectfully traverse this rejection. The Office Action concedes that nowhere does Brumley disclose a medium storing instructions to "manipulate a redundant array of independent disks modeled by the plurality of objects" as recited by claim 6. Final Office Action, p. 29. However, the Office Action contends that Muller discloses such a redundant array of independent disks modeled by a plurality of objects. Applicants respectfully disagree. In this regard, while Muller discloses an array of independent disks, nowhere does Muller teach or suggest that such an array be modeled by a plurality of objects nor manipulation of such modeled objects. Thus claim 6 and claims 7-10 depending therefrom are patentable over the proposed combination.

With respect to claims 16-21, which stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brumley in view of U.S. Patent No. 5,877,966 (Morris), Applicants respectfully traverse the rejection. This rejection is improper at least because there is no suggestion or motivation to combine the references. Brumley relates to software architecture for a data

acquisition system, whereas Morris relates to a configurator and use thereof to generate configurations. As such there is no motivation to combine these references from disparate fields.

More so, the portions of Morris cited, namely figure 2 and col. 5, lns. 29-39 and 54-57, merely relate to creating a configuration of a personal computer having a hard disk drive contained therein. Nowhere does Morris teach or suggest software which "models the plurality of disks as a plurality of disk objects" nor "provides a plurality of tools for performing a plurality of operations on a plurality of disk objects" nor "invokes a response by the plurality of disks to the plurality of operations performed on the plurality of disk objects". Further, as conceded by the Office Action, nor does Brumley, which relates to a data acquisition device not a plurality of disks. For at least these reasons, claim 16 and claims 17-21 depending therefrom patentably distinguish over the proposed combination.

More so, with respect to dependent claim 19, Applicants respectfully disagree that Brumley teaches or suggests multiple bus objects and multiple controller objects. In this regard, the figures cited by the Office Action, namely FIGS. 11-13, nowhere teach or suggest modeling a plurality of buses as a plurality of bus objects nor modeling a plurality of controllers as a plurality of controller objects, as recited by claim 19. For this further reason claim 19 and claims 20 and 21 depending therefrom are patentable over the proposed combination.

### ***C. Rejection of Claims Under 35 U.S.C. § 112***

The Office Action has rejected pending claims 1, 6-10, 16-17 and 19-21 under 35 U.S.C. § 112 as lacking enablement. Applicants respectfully traverse the rejection.

It appears that the Office Action asserts that this alleged lack of enablement relates to unclaimed features. As such these features are irrelevant for purposes of enablement under 35 U.S.C. § 112. Further, alleged missing unclaimed features, such as a "wrapper" are admitted by the Office Action as "well known in the art." Final Office Action, p. 9. As such, these features need not be present, as a specification need not disclose and preferably omits that which is well-known to those skilled in the art. *In re Buchner*, 18 USPQ2d 1331, 1332 (Fed. Cir. 1991).

With respect to the Office Action statement that there are no source code examples, it is respectfully submitted that such examples are unnecessary, as source code need not be present in order to enable a specification. See *Fonar Corp. v. General Electric*, 41 USPQ2d 1364 (Fed. Cir. 1997). As such, the rejection is improper and Applicants respectfully request that this ground of rejection to claims 1, 6-10, 16-17 and 19-21 be removed.

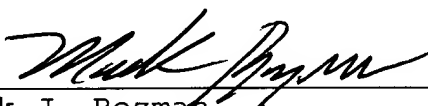
In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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## APPENDIX

### In the Claims:

1           1. (Amended)   A method comprising:  
2           defining a plurality of hardware devices as a plurality of  
3           objects, wherein the plurality of hardware devices comprise a  
4           redundant array of independent disks;  
5           providing a plurality of tools to perform a plurality of  
6           operations on the plurality of objects;  
7           executing a software program to use the plurality of tools;  
8           and  
9           responding to the plurality of operations by the plurality  
10          of hardware devices.

1           29. (Amended)   The method of claim [28] 1, wherein the  
2           plurality of objects comprise redundant array of independent  
3           disk objects.